

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

Cr. No. 11-340 (ERK) (SMG)

MOUSA KHOULI,  
SALEM ALSHDAIFAT,  
JOSEPH A. LEWIS II and  
AYMAN RAMADAN,

Defendants.  
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**NOTICE OF MOTION**

On behalf of the defendant Joseph A. Lewis, II, Peter A. Chavkin, Esq. and Bridget M. Rohde, Esq., of Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C., move to dismiss the indictment against him under on various grounds, and, alternatively, to suppress the materials seized from his email account and home, to dismiss Count 2, 4, 6 and Count 7, to inspect grand jury minutes, for advance notice of 404(b) evidence, and for such other relief as the Court may deem appropriate. Our Memorandum in Support of Omnibus Motions is attached.

Respectfully submitted,



Peter A. Chavkin, Esq.  
Bridget M. Rohde, Esq.  
Mintz, Levin, Cohn, Ferris,  
Glovsky and Popeo, P.C.  
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For the Defendant  
Joseph A. Lewis, II